

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

(A) \$568,556.00 in United States  
Currency;

(B) 2014, Gray, Porsche Cayenne  
SUV bearing Puerto Rico license plate  
number ICM134 with vehicle  
identification number (VIN)  
WP1AA2A28ELA90824;

(C) Apple i-Phone cellular phone  
with yellow cover and no identification  
number visible;

(D) Apple i-Phone cellular phone  
with black cover & white apple sticker  
with no identification number visible;

(E) Samsung cellular phone with  
burgundy cover, lm200429;  
lm2004302a5/ckd with 8GB MICRO  
SD HC Card, ZQL1693&1695 GMN4-  
1, >PC+20%GF<, ZOL1695G DS M2-  
1 V3, H20 SIM card: 8901410227  
2784896117 ;

(F) Apple i-Phone cellular phone  
with gray and white cover, model:  
A1522, FCC ID: BCG-E2817A  
IC:579C – E2817A; IMEI:  
354393067710039';

(G) Apple i-Phone cellular phone  
with coral cover and black plastic cover  
with sticker of letters with no  
identification number visible;

(H) Apple watch series: 4 44m  
aluminum & ceramic case -ion-x –  
glass-GPS-LTE-WR 50m black;

(I) LG cellular phone with black  
cover, model LG-M150, S/N:

Civil No.:

710VTJH257116, IMEI: 353712-09-257116-8;

(J) LG cellular phone with gray cover and white apple sticker, SH1188-3IN120/02-A4, SH1188-GSM-A3, IMEI: 356896-10-049130-8;

(K) SIM CARD CLARO with MICROSIM Adapter and number 89011 10012 11334 10369;

(L) SIM CARD with number TF64PSIMC4B 89014 103255601601827;

(M) Thumb drive Fuji Film black and red colors: 32gb: d57612 0092 d33193 n14939;

(N) Thumb drive black and white colors: 64gb: 906608 BN170125517B;

(O) Apple iPad white, with pink and gray cover, model: A1893, FCC ID: BCGA1893 IC:579C-A1893, serial: GG7XF4AQJMVR;

(P) Apple iPad gray, with pink and white cover, model A1432, FCC ID: BCGA1432 IC579C-A1432, SERIAL: F4KK9J5MF193;

(Q) Acer laptop s/n: NXG4XAA002751237497600, SN ID:75114522576;

(R) Night Owl DVR Recorder Model: DVR-HDA10LB-81-RS 8 Channel H.264 DVR w/1TB HDD FCC No. TCT160126E008C S/N 448A-010520;

(S) Apple MacBook laptop model a1278, fcc id: qds-brcm1038 ic-4324a-brcm1038 & fcc id: qds-brcm1037 ic-4324a-brcm1037 with 320gb wd drive, recertified wd3200bpkt s/n wx81a43n8323;

(T) Apple i-Phone XR cellular phone, black in color with serial number: DX3YJ5L6KXKN and T-

Mobile SIM Card number 8901260203  
789195464;

(U) Multiple Jewelry, as depicted in  
Section U of the Attachment A of the  
Unsworn Declaration by Rosa I.

Robles, Task Force Officer (HSI) and  
further described in Attachment B;

(V) Multiple watches, as depicted in  
Section V of Attachment A of the  
Unsworn Declaration by Rosa I.

Robles, Task Force Officer (HSI) and  
further described in Attachment C;

(W) Two Cobra 2-Way Radio and  
Charger;

(X) Money counting machine and  
monitor;

(Y) One Digital Pocket Scale;

(Z) Four pieces of luggage including  
2 suitcases and two bags, as depicted in  
Z Attachment A of the Unsworn  
Declaration by Rosa I. Robles, Task  
Force Officer (HSI).

Defendants *In Rem*.

**VERIFIED COMPLAINT  
FOR FORFEITURE IN REM**

The United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**Nature of the Action**

1. This is a civil action *in rem* under 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6), seeking forfeiture of: (1) any property, real or personal, which constitutes

or is derived from proceeds traceable to any offense constituting “specified unlawful activity” (as defined in section [18 U.S.C. § 1956(c)(7)]), that is, a the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), punishable under any law of the United States, or a conspiracy to commit such offense; and (2) all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. § 801, *et seq.*, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of 21 U.S.C. § 801, *et seq.*

### **Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

**The Defendant *In Rem***

4. The Defendants *In Rem* were seized from Urb. Paseos Reales, 66

Atienza Street in Aguadilla, Puerto Rico, on February 5, 2021, and are as follows:

- a) \$568,556.00 in United States Currency (USC);
- b) 2014, Gray, Porsche Cayenne SUV bearing Puerto Rico license plate number ICM134 with vehicle identification number (VIN) WP1AA2A28ELA90824;
- c) Apple i-Phone cellular phone with yellow cover and no identification number visible;
- d) Apple i-Phone cellular phone with black cover & white apple sticker with no identification number visible;
- e) Samsung cellular phone with burgundy cover, lm200429; lm2004302a5/ckd with 8GB MICRO SD HC Card, ZQL1693&1695 GMN4-1, >PC+20%GF<, ZOL1695G DS M2-1 V3, H20 SIM card: 8901410227 2784896117 ;
- f) Apple i-Phone cellular phone with gray and white cover, model: A1522, FCC ID: BCG-E2817A IC:579C – E2817A; IMEI: 354393067710039';
- g) Apple i-Phone cellular phone with coral cover and black plastic cover with sticker of letters with no identification number visible;
- h) Apple watch series: 4 44m aluminum & ceramic case -ion-x – glass-GPS-LTE-WR 50m black;
- i) LG cellular phone with black cover, model LG-M150, S/N: 710VTJH257116, IMEI: 353712-09-257116-8;
- j) LG cellular phone with gray cover and white apple sticker, SH1188-3IN120/02-A4, SH1188-GSM-A3, IMEI: 356896-10-049130-8;
- k) SIM CARD CLARO with MICROSIM Adapter and number 89011 10012 11334 10369;
- l) SIM CARD with number TF64PSIMC4B 89014 103255601601827;
- m) Thumb drive Fuji Film black and red colors: 32gb: d57612 0092 d33193 n14939;
- n) Thumb drive black and white colors: 64gb: 906608 BN170125517B;
- o) Apple iPad white, with pink and gray cover, model: A1893, FCC ID: BCGA1893 IC:579C-A1893, serial: GG7XF4AQJMR;
- p) Apple iPad gray, with pink and white cover, model A1432, FCC ID: BCGA1432 IC579C-A1432, SERIAL: F4KK9J5MF193;

- q) Acer laptop s/n: NXG4XAA002751237497600, SN ID:75114522576;
- r) Night Owl DVR Recorder Model: DVR-HDA10LB-81-RS 8 Channel H.264 DVR w/1TB HDD FCC No. TCT160126E008C S/N 448A-010520;
- s) Apple MacBook laptop model a1278, fcc id: qds-brcm1038 ic-4324a-brcm1038 & fcc id: qds-brcm1037 ic-4324a-brcm1037 with 320gb wd drive, recertified wd3200bpkt s/n wx81a43n8323;
- t) Apple i-Phone XR cellular phone, black in color with serial number: DX3YJ5L6KXKN and T-Mobile SIM Card number 8901260203 789195464
- u) Multiple Jewelry, as depicted in Section U of the Attachment A of the Unsworn Declaration by Rosa I. Robles, Task Force Officer (HSI) and further described in Attachment B;
- v) Multiple watches, as depicted in Section V of Attachment A of the Unsworn Declaration by Rosa I. Robles, Task Force Officer (HSI) and further described in Attachment C;
- w) Two Cobra 2-Way Radio and Charger;
- x) Money counting machine and monitor;
- y) One Digital Pocket Scale;
- z) Four pieces of luggage including 2 suitcases and two bags, as depicted in Section Z of Attachment A of the Unsworn Declaration by Rosa I. Robles, Task Force Officer (HSI).

5. The Defendant *In Rem* is within the possession, custody, or control of the United States.

### **Facts**

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent , Rosa I. Robles of ICE-HSI.

### **Claim for Relief**

7. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United

States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 2nd day of August 2021.

W. STEPHEN MULDROW  
United States Attorney

s/Linet Suárez  
Linnet Suárez  
Assistant U.S. Attorney  
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Torre Chardón Street  
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### VERIFICATION

I, Rosa I. Robles, depose and say that I am a Special Agent with ICE- HIS and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Amended Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 2nd day of August 2021.



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Rosa I. Robles, Special Agent  
ICE-HSI